REMARKS

The present application was filed on April 27, 2001 with claims 1-28. Claims 1-28 are currently pending in the application. Claims 1, 15, 27, and 28 are the independent claims.

In the Office Action, claims 1-6, 8, 10-12, 14-20, 22, and 24-28 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,527,638 (hereinafter "Walker") in view of Abramson, "Control Strategies for Two-Player Games" (hereinafter "Abramson") in further view of U.S. Patent No. 6,496,808 (hereinafter "Aiello"). In addition, claims 7, 13, and 21 are rejected under 35 U.S.C. §103(a) as being unpatentable over Walker in view of Aiello in further view of U.S. Patent No. 5,018,196 (hereinafter "Takaragi").

The Examiner indicates that dependent claims 9 and 23 would be allowable if rewritten in independent form.

Applicants respectfully traverse the §103(a) rejections and request that the pending claims be reconsidered in light of the following remarks.

Independent claim 1 sets forth:

A method for performing secure information processing operations utilizing a plurality of processing devices, the method comprising the steps of:

performing a setup procedure to permit interactions of a designated type to be carried out between a first participant associated with at least a first one of the processing devices and a second participant associated with at least a second one of the processing devices;

initiating in the first processing device a particular interaction with the second participant, by sending designated initiation information to the second processing device associated with the second participant, the particular interaction being configured based at least in part on one or more results of the setup procedure;

receiving as part of the interaction response information from the second processing device associated with the second participant; and

sending as part of the interaction additional information from the first processing device to the second processing device based at least in part on the received response information;

wherein the interaction is configured such that the information exchanged between the first and second processing devices can be used to determine rights of the first and second participants in a publicly verifiable manner, the rights being based upon particular results of the interaction;

wherein the interaction comprises a number of consecutive rounds of one or more decisions by each of the first participant and the second participant;

wherein the interaction is characterized by a first tree structure associated with the first participant and a second tree structure associated with the second participant, each of the tree structures comprising a plurality of nodes, each of at least a subset of the nodes comprising a block of data that determines randomness contributed to a corresponding round of the interaction by the corresponding participant, wherein associated with each of at least a subset of the nodes are decision preimage values that encode possible decisions to be made in the interaction.

In order to establish *prima facie* obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." Manual of Patent Examining Procedure (MPEP), Eighth Edition, August 2001, Revision August 2006 §2142. In formulating the §103(a) rejection of independent claim 1, the Examiner states that Walker does not explicitly disclose that an "interaction is characterized by a first tree structure associated with a first participant and a second tree structure associated with a second participant" in the manner claimed. Rather, the Examiner argues that these elements are taught or suggested by Abramson at p. 137, col. 2, 2nd paragraph and at p. 152, col. 2, 2nd paragraph. Current Office Action, pp. 4 and 5.

Applicants respectfully disagree with the Examiner's characterization of Abramson. The portions of Abramson cited by the Examiner introduce the game-tree model developed by Shannon and the (d, b, F)-tree model developed by Pearl for use in modeling two-player games. These models each use a single tree structure to describe a game. Each node in a tree describes a possible state of the game. Abramson, p. 138, col. 1. Independent claim 1, in contrast, sets forth an interaction characterized by two tree structures: "a first tree structure associated with the first participant and a second tree structure associated with the second participant." Abramson therefore fails to teach or suggest at least these limitations of claim 1.

What is more, the Examiner argues that Walker and Abramson fail to disclose that "at least a subset of nodes [of tree structures] are decision preimage values that encode possible decision to be made in the interaction," but that this limitation is taught or suggested by Aiello at col. 5, ll. 20-43. Current Office Action, p. 5. Applicants again respectfully disagree. The portion of Aiello cited by the examiner describes an interaction in which each participant in a card game (in this case, a device

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and a smartcard) chooses random numbers so that the next dealt card can be determined. There is no discussion of decision preimage values that encode possible <u>decisions</u> made by the participants in the manner claimed.

As a result, the Walker-Abramson-Aiello reference combination fails to teach or suggest all the limitations of claim 1. Independent claims 15, 27, and 28 contain limitations similar to independent claim 1 and are rejected on similar grounds. Therefore, independent claims 15, 27, and 28 are believed to be in condition for allowance for reasons similar to those set forth above for independent claim 1.

Applicants further submit that dependent claims 2-6, 8, 10-12, 14, 16-20, 22, and 24-26 are allowable for at least the same reasons as their respective independent base claims. In addition, many of these dependent claims are believed to contain separately patentable subject matter over the Walker-Abramson-Aiello reference combination.

As just one example, dependant claim 6 sets forth:

> The method of claim 1 wherein the particular interaction comprises secure mobile gaming interaction involving two or more players in which the first participant corresponds to a first player and the second participant corresponds to a second player.

In formulating the §103(a) rejection of this claim, the Examiner argues that the claim limitations are taught or suggested by Walker at col. 8, ll. 23-47 and at col. 11, ll. 38-50. Current Office Action, p. 7. Nevertheless, Applicants respectfully assert that these portions of Walker fail to teach or suggest a second participant that is a second player. Instead, Walker only teaches an interaction between a player and "wagering establishment" (e.g., casino, government lottery organization, or other wagering establishment). Walker, col. 8, ll. 24-33.

With respect to the §103(a) rejection of dependent claims 7, 13 and 21 over Walker in view of Aiello in further view of Takaragi, Applicants respectfully submit that Takaragi fails to remedy the above-described fundamental deficiencies of Walker and Aiello as applied to independent claims 1 and 15.

In light of the above, Applicants respectfully request that the §103(a) rejections of claims 1-28 be withdrawn.

Respectfully submitted,

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